

UNITED STATES DISTRICT COURT OF THE SOUTHERN DISTRICT OF NEW YORK

THOMAS JEROME RADFORD SR.

-AGAINST-
SCLC AND

18 CV 10325
CASE #

COMPLAINT

Surv Trial

1. MARTIN LUTHER KING III
2. BEY NICE KING
3. DEXTER S. KING
4. REV. JAMES BUSH
5. REV. RAJEIGH TAMMELL
6. REV. SYLVE TUCKER
7. CHARLES STEEL JR - CEO
8. ISARS NEWTON FARRIS JR.
9. DR. BERNARD LAFAYETTE JR.
10. SAIVAR GORDON

Exhibit A
ATTACH
NOTICE

2018-11-06 PM 1:39

NAACP AND

11. CORNELL WILLIAM BROOKS - PRESIDENT
12. KWEISI MFUME - FORMER PRESIDENT
13. LEON W. RUSSEL - CHAIRMAN
14. ROSLYN M. BROCK - PRESIDENT
15. DERRICK JOHNSON - VICE CHAIRMAN
16. JESSIE TURNER JR. - TREASURER
17. YVONNE WHITE - ASSISTANT TREASURER
18. STEVEN ALLEN SPIELBERG - FILM PRODUCER
19. DENNIS COURTLAND HAYES - CEO
20. BRUCE S. GORDON - CEO
- (20) AUBREY C. HOOVER

Exhibit A
ATTACH
NOTICE

CNN NEWS AND

21. JEFF ZUCKER
22. COM CAST AND BRIAN ROBERT CEO/CHAIRMAN
23. NETFLIX AND REED HASTINGS CHAIRMAN
24. WALT DISNEY - ROBERT A IGER
25. AT&T - RANDA L. STEPHENSON

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

4th USC 1983

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, THOMAS J. RADFORD Sr., is a citizen of the State of
(Plaintiff's name)

NEW YORK

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

THOMAS	J.	RADFORD, Sr.
First Name	Middle Initial	Last Name
P.O. Box 230673		
Street Address		
Brooklyn	NY	11223
County, City	State	Zip Code
(205) 591-1953	radfordsrthomas@gmail.com	
Telephone Number	Email Address (if available)	

3

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

11-3-18

Dated

[Signature]
Plaintiff's Signature

THOMAS

First Name

J.

Middle Initial

RADFORD SR.

Last Name

P.O. Box 230673

Street Address

BROOKLYN

County, City

N.Y.

State

11223

Zip Code

205-541-1953

Telephone Number

RADFORD SR THOMAS@gmail.com

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

BEING MADE OF LIKE A ROBOT TO DO AND ACT LIKE
A ROBOT IN A HUMAN BODY.

PAIN AND SUFFERING WITH EMOTIONAL
DISTRESS THAT'S NOT NAME OF IN A HUMAN
BEING.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

* COMPENSATION ONE BILLION WAIT DISNEY ROBERT IGER

ONE BILLION CNN NEWS JEFF ZUCKER, ONE BILLION FROM
COMCAST BRIAN ROBERT CEO/CHAIRMAN, ONE BILLION NETFLIX
REED HASTING CHAIRMAN, 10 BILLION CNN NEWS, 10 BILLION NETFLIX,
10 BILLION COMCAST, THIRTY FIVE BILLION SCLC AND DEFENDANTS,
THIRTY FIVE BILLION NAACP AND DEFENDANT, THIRTY FIVE BILLION
LOCAL 937 UNION AND DEFENDANTS: CONTRACTS, PLAINTIFFS SENT TO
ALL THREE (NAACP, SCLC, LOCAL 937 UNION)
* PUNITIVE DAMAGES IN THE AMOUNT OF \$1 BILLION FOR EACH DEFENDANT
AND \$3 BILLION FROM EACH COMPANY

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

ALABAMA CORRECTIONAL FACILITY

Date(s) of occurrence:

1988-2018

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

THE COMPLAINT OF PLAINTIFF, THOMAS DEVON RAYFORD SR. RESPECTFULLY SHOW AND ALLEGES AS FOLLOWS:

1. THE PLAINTIFF HEREIN, THOMAS DEVON RAYFORD SR. IS A RESIDENT OF THE STATE OF NEW YORK. MR. RAYFORD SR. RESIDES IN BROOKLYN/BRONX NY. 10456 P.O. BOX 230673 BROOKLYN NY. 11223

2. THE DEFENDANTS HEREIN, KEVIN MUMFORD FORMER PRESIDENT OF "NAACP" AND STEVEN ALLEN SPIELBERG FILM PRODUCER ENTER INTO A CONTRACT UNDER "NAACP" TO REPRESENT PLAINTIFF IN MOVIES AND PRODUCTION IN THE BOOKS OF "STATUE TO STATUE" AS BEING A PRISONER OF THE STATE OF ALABAMA AND THE LIFE STYLE I LIVED PLUS A CITY WORKER FOR NEW YORK CITY HOUSING

CONTINUE

Authority. Plaintiff was serving 28 years in Alabama State Prison at the time of the Contract Agreement by mail. (USPS)

3. Plaintiff Radford St. desired to have movies done, Mr. and Defendants discussed his needs and specification for this project through mail (USPS)

4. On about 2000 Plaintiff and Defendants MFunk and Spielberg entered into a written agreement pursuant where to Plaintiff agreed to pay his fee for movies.

5. On about 2003 or 2 failed to produce the movies and MFunk and Spielberg colluded conspiring, frauding Plaintiff out of Plaintiff books I sent to them. (NAACP) concerning the media and its companies in a "invasion" of Plaintiff privacy by placing computer chips into Plaintiff body with close circuit T.V. monitors that was planted in and around Plaintiff. This suit on the media and companies for invading Plaintiff privacy for capital gain.

6. On about 2001 Plaintiff mother Alice M. Radford carried movie books down to City Hall, Birmingham Ala, where she met Fred Shuttlesworth. He reassured my mother he would get those books of "State to State" and publish them working for and with SCLC as a member.

7. ON ABOUT 2003 PLAINTIFF BEGAN TO WRITE "STATUE TO STATUE THREE (3) ASKING FOR THIRTY FIVE BILLION (\$5) DOLLARS FOR THE INVADING PLAINTIFF PRIVACY AND FAMILY MEMBERS CAUSING HARM TO PLAINTIFF MENTAL STATE, BY PLACING COMPUTER CHIPS INTO PLAINTIFF BODY PARTS AND CLOSER CIRCUIT T.V. TO MONITOR PLAINTIFF. PLAINTIFF MAIL CONTRACTS TO LOCAL 237 UNION NYC, BECAUSE LOCAL 237 UNION IN THE PAST AS A HOUSING WORKER REPRESENTED PLAINTIFF IN HOUSING AUTHORITY NOW BEING RETIRED SINCE 1980 I / PLAINTIFF CALL ON THEM / LOCAL 237 UNION TO REPRESENT PLAINTIFF IN THIS SUIT FOR THIRTY FIVE BILLION DOLLARS, ALSO SENT / MAIL "SCLC" CONTRACTS TO REPRESENT PLAINTIFF IN THIS SUIT AS WELL FOR THIRTY FIVE BILLION DOLLAR SKEING THAT FRED SHATTUCKWORTH TOOK THE SAME ROAD "NAACP" WITH KURISI MURPHY AND STEVEN ALAN SPIRBERG REPRESENTS NAACP

8. AROUND ABOUT 2004 STATUE TO STATUE MANUSCRIPTS WAS STOLEN FROM PLAINTIFF AND THE ATTORNEYS FOR PLAINTIFF BEGAN TO SAY: THE BOOKS "STATUE TO STATUE"

belong to some else. I didn't understand at first but by and by things became more clear to Plaintiff.

9. Around about 2009 or so my Attorney Local 237, SCLC and NAACP began to colluding and conspiring together that Plaintiff books of STATURE TO STATURE WAS WRITTEN BY A INMATE WHITE BOY NAME WILLIAMS, DAVID CONCERNING PLAINTIFF books of STATURE TO STATURE THAT MEAN FROM STATURE OF LIBERTY TO IRON MAN IN BIRMINGHAM ALABAMA. I JUST DON'T NOT FEEL INTO THAT LIE! -

10. PLAINTIFF WAS SHIP TO LINCOLN PRISON IN HUNTSVILLE ALA WHERE PLAINTIFF CONTINUE TO TEACH & SPEAK THE WORDS OF JESUS CHRIST AND WAS PUT INTO LOCK UP FOR DOING SO, FOR SEGREGATION IN LINCOLN PRISON ON CHARGES OF PROMOTING THE PEOPLE OF JESUS CHRIST TO MANY GATHER ON THE BIG YARD TO LISTEN AT THE TEACHING OF JESUS CHRIST AND PLAINTIFF WAS LOCK UP WITHOUT A CHARGE FOR OVER TWENTY DAYS.

11. WHILE IN SEQUESTRATION AS I KNEW AFTER Plaintiff Identity was being TAKING AWAY FROM Plaintiff bring it was so quiet AND NO ONE TO TALK TO!... THE MEDIA AND THE STATE OF ALABAMA WAS pulling off THE BIGGEST Identity THIEF EVER.

12. IN AND AROUND "2012" Plaintiff began TO WRITE A book call "Diamond Girl 2012" WITH MANY CHAPTERS AND ACTORS AND PLAYERS being named: President OBAMA AND STEVE HARVEY. Plaintiff WAS AT Bullock Prison Facility. Plaintiff Ship by MAIL (USPS) "Diamond Girl 2012" MANUSCRIPTS TO President OBAMA White House AND THE MANUSCRIPTS WAS IN RECEIVED IN "Boston City" AND MY Writing WAS GIVEN THE CREDIT TO A SECRETARY NAME Cyathia Stubbs AND pushing it THROUGH AS IF SHE Wrote "Diamond Girl 2012". Cyathia Stubbs WAS A SECRETARY AT Bullock Prison in THE Shift COMMANDER OFFICE.

13. Plaintiff Wrote FURMAN ATTORNEY BY (USPS) CERTIFIED, ERIC HELDEN CONCERNING MY DOCKS AND THREATS ABOUT Plaintiff CONCERNING Plaintiff MANUSCRIPTS. IT APPROVED ERIC HELDEN WAS INVESTIGATING THE CASE FOR THE LONGEST UNTIL HE RETIRED.

14. SEEMS LIKE EVERY BODY HAS BEEN
BOUGHT TUNA AWAY. NOW I'M OUT OF PRISON
AND TURNING TO THE "UNITED STATES DISTRICT
COURT OF THE SOUTHERN DISTRICT OF NEW YORK"
60 CATH ST. NEW YORK CITY "FOR JUSTICE TO
PREVAIL. NO ONE IS ABOVE THE LAW, NO ONE
MR. TURN "HELLAW CHINER NOT MR. TRUMP! NO ONE!..."

15. THIS IS A SITUATION THAT'S HAPPENING
WITH PLAINTIFF. THE THOUGHT OF MY DEFENDANT
PLACING COMPUTER CHIPS INTO PLAINTIFF BODY
TO CONFOLD AND HEAR ALL PLAINTIFF VITAL
SIGNS AND THIS IS VERY VERY DISTURBING
TO PLAINTIFF. ITS LIKE A BUNCH OF
"HYENAS DOGS" GRABBING AT THEIR DADLY
ABOUT SUCH POWERFUL PEOPLE LIKE: SCLCS,
NAACP, COMCAST, NETFIX AND CNN NEWS.
AND 8 OR 9 MORE MEDIA TV BROADCASTING
STATION, WITH 250 BILLION DOLLAR
COMPANIES MAKING FUNDS THROUGH EXPLOITING
PLAINTIFF THROUGH TV, SEXUAL, NEWS PAPER
RADIO. I WAS TRAIN TO PERFORM THINGS THAT
WOULD DELIGHT THE VIEWERS THROUGH HIDDEN
CAMERAS. I WAS MONITOR 24/7 EVEN IF I
MOVE MY FEET THE SOUND ARE ACT WOULD COME
EVEN THROUGH THE PRISON LIGHTS THAT
THEY WERE WATCHING ME. THEY EVEN
HEARD MY HEART BEAT. 11

16. I became a HUMANITY FOR THE WORLD/CIRCUS TO PERFORM ACTS. I WAS BEING CONSIDERED LITTLE DID I KNOW TO DO WHAT EVER ACT THE DEFENDANTS WANTED ME TO DO FOR THEM. EVERYONE KNEW WHEN I Woke UP AND WENT TO BED ALSO.

EVEN NOW WHEN I GO TO THE STREET FOR SHOPPING ETC. THERE WOULD BE MANY PEOPLE AWAIT PLAINTIFF IN SOME FORM OR FASHIONS TO GRAB THEM TO GIVE THEM SOME KIND OF ATTENTION IN SOME FORM OR MANNER.

17. PLAINTIFF WILL BE FILING A CRIMINAL CASE AGAINST NAACP, SCLC AND LOCAL 237 UNION FOR THE DEATH OF PLAINTIFF MOTHER THRU DR. SHAWCROSS SURGICAL HANDS ON THE OPERATING TABLE. PLAINTIFF MOTHER CARRIED THE BACKS OF PLAINTIFF TO MR. SHAWCROSS WORK. AND SHE WAS THE ONLY WITNESS.

* SCLC

CERTIFICATE OF SERVICE

PLAINTIFF: THOMAS JEROME RADFORD SR.
DEFENDANTS: MARTIN LUTHER KING III - PRESIDENT.
BERNICE KING - MEMBER ETC.
DEXTER SCOTT KING - MEMBER
REV. JAMES BUSH - MEMBER ETC.
REV. RALEIGH TAMMELL - MEMBER ETC.
REV. SYLVIA TUCKER - MEMBER ETC.
SPIVER GORDON - TREASURER
CHARLES STEEL JR - PRESIDENT CLO
ISAAC. NEWTON FARRIS JR. - MEM.
DR. BERNARD LAFAYETTE JR. CHAIR.

COMPLAINT

- 1) PLEASE TAKE NOTICE THAT PLAINTIFF: THOMAS JEROME RADFORD SR. WILL BE FILING A SUIT IN THE SUPREME COURT IN THIRTY DAYS (30) FROM THE DATE YOU RECEIVE THIS NOTICE OF INTENTION.
- 2) ON OR AROUND 2001-2004 UNTIL 2013 I SENT CONTRACT TO YOU SCLC TO REPRESENT ME AND HELP YOUR CAUSE OF SELLING YOUR FATHER'S POSSESSIONS PUTTING UP FOR SALE.
- 3) I MARCH WITH YOUR FATHER IN 1963 BLIND ALMA. I BELIEVE YOU GUYS DESERVE MORE, SO I MADE SCLC A PART OF MY WEALTH IN MY BOOKS 'STATUE TO STATUE AND DIAMOND GIRL 2013'.
- 4) FINDING OUT YOU HAVE COMPLAIN ON ME WITH LOCAL 237 UNION IN NYC. AND NAACP.
- 5) IT HAS BEEN TOLD TO ME BY THE LAWMAN YOU ARE DOLLING OFF A IDENTITY THAT BY TAKING MY BOOKS 'STATUE TO STATUE AND DIAMOND GIRL 2013' STATIS THAT A WOMAN, CYNTHIA STUBBS AND A WHITE MAN, WILLIAMS DONE THE WRITING AND NOT ME!
- 6) I'M APPALLED OF YOU AND YOUR INTENT TRYING TO DO SUCH AFTER ME SHOWING SO LOVE TOWARD YOUR FAMILY AND THE LOVE I HAVE FOR YOUR FATHER MARTIN LUTHER KING JR "GOD BLESS HIS SOUL".
- 7) THE THIRTY FIVE Billion dollars CONTRACT CONCERNING MY BOOKS 'STATUE TO STATUE & DIAMOND GIRL 2013' I SENT YOU IN AGREEMENT THAT YOU WOULD TAKE YOUR SHARE AND SEND ME MIND WHICH NEVER HAPPEN.
- 8) I'M STILL GOING ON AS A CIVIL RIGHTS ACTIVIST ON THE NYC TRAINS. I LEARN A LOT FROM YOUR FATHER AND I WAS THERE WHEN HE WROTE THAT FAMEUS LETTER IN BLAME CITY Jail.
- 9) I DON'T WANT TO GET DAUGHT UP IN THE LOVE I HAVE FOR YOUR FATHER BUT I ASK YOU TO SETTLE WITH ME BEFORE I TAKE YOU TO COURT. THE PUBLIC DON'T NEED THIS CONCERNING THE FAMILY SCLC.
- 10) PRAY ABOUT IT LET GOD USE YOU, HE WILL IF YOU JUST GIVE HIM A CHANCE.

THOMAS J. RADFORD

205-541-1953

SSN 3112

SINCERELY,
Thomas Jerome Radford
THOMAS JEROME RADFORD SR.
4-6-2018

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

ATLANTA, GA 30303

OFFICIAL USE

Certified Mail Fee	\$3.45	
Extra Services & Fees (check box, add fee as appropriate)	\$2.75	0151
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	40
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.50	
Total Postage and Fees	\$3.70	

Sent To SCLC
Street and Apt. No., or PO Box No.
390 AUBURN AVE. NE
City, State, ZIP+4®
ATLANTA, GA, 30303

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

* NAACP

CERTIFICATE OF SERVICE

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
CHICAGO, IL 60643	
Certified Mail Fee	\$3.45
Extra Services & Fees (check box, add fee as appropriate)	\$2.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.50
Total Postage and Fees	\$6.70
Sent To	NAACP
Street and Apt. No., or PO Box No.	10540 S. WESTON AVE STE 201
City, State, ZIP+4®	CHICAGO, ILLINOIS 60643
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

2546 955E 0000 0990 4707

COMPLAINT

1) PLEASE TAKE NOTICE THAT PLAINTIFF: THOMAS JEROME RADFORD SR. IS FILING A SUIT IN THE SUPREME COURT IN THIRTY DAYS (30) FROM THE DATE YOU RECEIVE THIS NOTICE OF INTENTION.

2) ON OR AROUND 2001 PLAINTIFF/I SENT CONTRACTS TO NAACP CONCERNING MY BOOKS THAT I WROTE IN PRISON NAMED 'STATUE TO STATUE AND DIAMOND GIRL 2012' CONTINUE TO WRITE UP UNTIL 2013. WHICH YOU NAACP HAVE COLLECTED SUM OF MONEY AND KWEISI MFUME RETIRED AND RAN OFF TO AUSTRALIA CONSPIRING WITH PRODUCER ALLEN SPIELBERG THAT THEY WERE GOING TO PRODUCE AND MY A FILM OUT OF MY BOOKS BUT TOOK THE MONEY FOR THEMSELVES.

3) I CONTINUE TO SEND CONTRACTS WITHOUT KNOWING THE OUT COME BUT CONTINUE TO WRITE MANY BOOKS AND ONE THAT MOSTLY STAND OUT OR STATUE TO STATUE AND DIAMOND GIRL 2012.

4) MY MOTHER TOOK SOME OF MY BOOKS DOWN TO CITY HALL BIRMINGHAM TO MR. SHUTTLES WORTH AND LATER WAS CUT UP ON THE OPERATOR TABLE BY A DR. NAME CROSS WHITE TO THE POINT SHE DIED IN A FEW MONTHS.

5) MY MOTHER WAS A DIE HEART NAACP MEMBER BUT YOU TREATED HER LIKE SHE WAS NOTHING.

6) IT HAS BEEN TOLD TO ME YOU HAVE COLLECTED BILLIONS ON MY BOOKS THROUGH 'MEDIA PERSONNEL' ETC. AND FROM THEM.

7) YOU HAVE BEEN CONSPIRING WITH LOCAL 337 AND SELL WHO GOT THE BIGGEST TAKE FROM MY BOOKS SELL FROM 'STATUE TO STATUE AND DIAMOND GIRL 2012'.

8) I SENT YOU A (35) BILLION THIRTY FIVE DOLLAR CONTRACTS AND I HOPE WE CAN COME TO A AGREEMENT.

9) MY MOTHER LOVE YOU GUYS AND I KNOW SHE DON'T WANT THIS PUBLICIZE NO MORE THAN I! I HOPE WE CAN REACH AGREEMENT AND WE BOTH CAN GO ON TO REACH OUR GOALS.

THOMAS J. RADFORD

205-541-1953

SSN 3112

SINCERELY
THOMAS JEROME RADFORD SR.
THOMAS JEROME RADFORD SR.
4-6-2018

A

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: MARTIN L. KING III
 First Name Last Name
SCLC - PRESIDENT OR FORMER PRESIDENT
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 2: BERNICE KING
 First Name Last Name
SCLC - MEMBER
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 3: DEXTER S. KING
 First Name Last Name
SCLC - MEMBER
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

B

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: REV. JAMES BUSH
 First Name Last Name
SCLC - MEMBER ETC.
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 2: REV. RALPH TAMMELL
 First Name Last Name
SCLC - MEMBER ETC
 Current Job Title (or other identifying information)
ATLANTA - SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 3: REV. SYLVESTER TUCKER
 First Name Last Name
SCLC - MEMBER
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

C

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

CHAHES STEEL Sr.
 First Name Last Name
CEO ETC President
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE. N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 2:

ISAAS N. FARRIS Sr.
 First Name Last Name
SCLC - MEMBER
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE. N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 3:

Dr. BERNARD LAFAYETTE Sr.
 First Name Last Name
SCLC - CHAIRMAN
 Current Job Title (or other identifying information)
SCLC - 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

D.

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: SPIVAK BORDON
 First Name Last Name
SCLC - TREASURER
 Current Job Title (or other identifying information)
SCLC - 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 2: RANDALL L. STEPHANSON
 First Name Last Name
CEO ETC
 Current Job Title (or other identifying information)
208 S. AKAM ST
 Current Work Address (or other address where defendant may be served)
DALLAS TX 75202
 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

E

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: CORNELL W. BROOKS
 First Name Last Name
NAACP - President
 Current Job Title (or other identifying information)
NAACP 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO ILLINOIS 60643
 County, City State Zip Code

Defendant 2: KWEISI MFUME
 First Name Last Name
NAACP - FORMER PRESIDENT
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO IL. 60643
 County, City State Zip Code

Defendant 3: LEON W. RUSSELL
 First Name Last Name
NAACP - CHAIRMAN
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO IL 60
 County, City State Zip Code

F

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Roslyn M. Brock - President
 First Name Last Name
NAACP - President
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
Chicago IL 60643
 County, City State Zip Code

Defendant 2:

Derrick Johnson
 First Name Last Name
NAACP - Vice Chairman
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE. STE 201
 Current Work Address (or other address where defendant may be served)
Chicago IL 60643
 County, City State Zip Code

Defendant 3:

Jessie Turner Jr.
 First Name Last Name
NAACP - Treasurer
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE. STE 201
 Current Work Address (or other address where defendant may be served)
Chicago IL 60643
 County, City State Zip Code

EG

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

YVONNE WHITE
 First Name Last Name
NAACP - ASSISTANT TREASURER.
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO IL. 60643
 County, City State Zip Code

Defendant 2:

AUBREY C. HOOPER-A.
 First Name Last Name
NAACP - ASSISTANT SECRETARY STE 201
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE
 Current Work Address (or other address where defendant may be served)
CHICAGO IL. 60643
 County, City State Zip Code

Defendant 3:

STEVEN A. SPIELBERG
 First Name Last Name
NAACP - Film producer
 Current Job Title (or other identifying information)
NAACP - 10540 S. WESTON AVE.
 Current Work Address (or other address where defendant may be served)
CHICAGO IL. 60643
 County, City State Zip Code

H

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: DENNIS C. HAYES
 First Name Last Name
NAACP - CEO ETC.
 Current Job Title (or other identifying information)
NAACP 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO IL 60643
 County, City State Zip Code

Defendant 2: BLUCE S. GORDON
 First Name Last Name
NAACP - CEO ETC
 Current Job Title (or other identifying information)
NAACP 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO IL 60643
 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

I

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

<u>JEFF</u>		<u>ZUCKER</u>	
First Name		Last Name	
<u>CNN PRESIDENT-CEO</u>			
Current Job Title (or other identifying information)			
<u>CNN / CNN CENTER</u>			
Current Work Address (or other address where defendant may be served)			
<u>ATLANTA</u>	<u>GA</u>	<u>30348</u>	
County, City	State	Zip Code	

Defendant 2:

<u>CNN</u>		<u>NEWS</u>	
First Name		Last Name	
<u>CNN</u>			
Current Job Title (or other identifying information)			
<u>CNN / CNN CENTER</u>			
Current Work Address (or other address where defendant may be served)			
<u>ATLANTA</u>	<u>GA.</u>	<u>30348</u>	
County, City	State	Zip Code	

Defendant 3:

<u>COMCAST</u>		<u>COMPANY</u>	
First Name		Last Name	
<u>COMCAST - COMPANY</u>			
Current Job Title (or other identifying information)			
<u>COMCAST - 1701 JOHN F KENNEDY BLVD APT 1</u>			
Current Work Address (or other address where defendant may be served)			
<u>PHILADELPHIA</u>	<u>PA</u>	<u>19103-2838</u>	
County, City	State	Zip Code	

J
1

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: BRIAN ROBERT
 First Name Last Name
COMCAST - CEO/CHAIRMAN
 Current Job Title (or other identifying information)
COMCAST 1701 JOHN F KENNEDY BLVD APT 1
 Current Work Address (or other address where defendant may be served)
Philadelphia PA 19103-2838
 County, City State Zip Code

Defendant 2: NETFLIX COMPANY
 First Name Last Name
NETFLIX COMPANY
 Current Job Title (or other identifying information)
NETFLIX 100 WINCHESTER CIRCLE LOS
 Current Work Address (or other address where defendant may be served)
GATOS CA 95032
 County, City State Zip Code

Defendant 3: REED HASTINGS
 First Name Last Name
NETFLIX CHAIRMAN
 Current Job Title (or other identifying information)
NETFLIX 100 WINCHESTER CIRCLE LOS
 Current Work Address (or other address where defendant may be served)
GATOS CA 95032
 County, City State Zip Code

K

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

WAIT DISNEY
 First Name Last Name
WAIT DISNEY
 Current Job Title (or other identifying information)
WAIT DISNEY 500 S BUENA VISTA ST
 Current Work Address (or other address where defendant may be served)
BURBANK CA 91521-0001
 County, City State Zip Code

Defendant 2:

ROBERT A IGER
 First Name Last Name
WAITDISNEY CHAIRMAN (CHIEF) CEO ETC
 Current Job Title (or other identifying information)
WAITDISNEY 500 S. BUENA VISTA ST.
 Current Work Address (or other address where defendant may be served)
BURBANK CA 91521-0001
 County, City State Zip Code

Defendant 3:

AT&T AT&T
 First Name Last Name
AT&T AT&T
 Current Job Title (or other identifying information)
208 S. AKAK ST.
 Current Work Address (or other address where defendant may be served)
DALLAS TX 75222
 County, City State Zip Code

L

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: NAACP NAACP
 First Name Last Name
NAACP NAACP
 Current Job Title (or other identifying information)
NAACP 10540 S. WESTON AVE STE 201
 Current Work Address (or other address where defendant may be served)
CHICAGO IL. 60643
 County, City State Zip Code

Defendant 2: SCLC SCLC
 First Name Last Name
SCLC SCLC
 Current Job Title (or other identifying information)
SCLC 320 AUBURN AVE N.E.
 Current Work Address (or other address where defendant may be served)
ATLANTA GA 30303
 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

VERIFICATION

STATE OF NEW YORK

COUNTY OF _____ ss:

_____, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

[sign your name in front of a Notary]

[print your name]

Sworn to before me this

_____ day of _____, 20____

Notary Public

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